

## **EXHIBIT 23**

1  
2 UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

3 ----- X

4 NATIONAL ASSOCIATION FOR  
THE ADVANCEMENT OF  
COLORED PEOPLE,

5 SPRING VALLEY BRANCH, et al.,

6 Plaintiffs,

7 vs.

No.

7:17-cv-08943

8 EAST RAMAPO CENTRAL

9 SCHOOL DISTRICT, et al.,

10 Defendants.

----- X

11  
12 February 8, 2018

13 10:26 a.m.

14  
15  
16 Deposition of ERIC GOODWIN, held  
17 at the offices of Morgan, Lewis & Bockius  
18 LLP, 101 Park Avenue, New York, New York,  
19 pursuant to Notice, before Theresa  
20 Tramondo, AOS, CLR, a Notary Public of the  
21 State of New York.

22  
23 Reported by:

24 THERESA TRAMONDO, AOS, CLR

25 JOB NO. PA2808169A

1

2 BY THE COURT REPORTER:

3 Q. Please state your full name for  
4 the record.

5 A. Eric Goodwin, G-O-O-D-W-I-N.

6 Q. What is your address?

7 A. Home address, 87 Meadow Lane,  
8 Nanuet, New York 10954.

9 E R I C G O O D W I N , called as a  
10 witness, having been duly sworn by a  
11 Notary Public, was examined and testified  
12 as follows:

13 EXAMINATION BY

14 MR. LEVINE:

15 Q. Good morning, Mr. Goodwin.

16 A. Good morning.

17 Q. My name is Randall Levine. I'm  
18 an attorney for the East Ramapo Central  
19 School District.

20 A. Yes.

21 Q. Do you understand you're here  
22 today to give testimony in a case called  
23 NAACP versus East Ramapo Central School  
24 District?

25 A. Yes, I do.

1 Goodwin

2 Q. Do you think that the Black  
3 community, to the extent you have an  
4 understanding, feels disenfranchised because  
5 of their race?

6 A. Are we speaking in terms of East  
7 Ramapo or African Americans across the  
8 board?

9 Q. Just East Ramapo.

10 A. Could you say the question  
11 again?

12 Q. Yes. I'll do it better this  
13 time.

14 Do you think that Black  
15 residents of East Ramapo feel  
16 disenfranchised because they're Black?

17 MS. PARVIS: Objection.

18 A. I can't speak for all African  
19 Americans. I feel disenfranchised  
20 because -- I can't speak for all African  
21 Americans. I can only speak for me.

22 Q. Do you think that you lost your  
23 election for the school board because of  
24 your race?

25 A. No.

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C E R T I F I C A T E  
STATE OF NEW YORK       )  
                                     :  S S .  
COUNTY OF NEW YORK    )

I, THERESA TRAMONDO, a Notary  
Public within and for the State of New  
York, do hereby certify:

That Eric Goodwin, the witness  
whose deposition is hereinbefore set  
forth, was duly sworn by me and that such  
deposition is a true record of the  
testimony given by the witness.

I further certify that I am not  
related to any of the parties to this  
action by blood or marriage, and that I am  
in no way interested in the outcome of  
this matter.

IN WITNESS WHEREOF, I have  
hereunto set my hand this 19th day of  
February, 2018.



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THERESA TRAMONDO

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WITNESS	EXAMINATION BY	PAGE
E. GOODWIN	MR. LEVINE	5
	MS. MATTHEWS	110

----- INFORMATION REQUESTS -----

DIRECTIONS: (NONE)  
 RULINGS: (NONE)  
 TO BE FURNISHED: (NONE)  
 REQUESTS: (NONE)  
 MOTIONS: (NONE)  
 CONFIDENTIAL: (NONE)

----- EXHIBITS -----

GOODWIN EXHIBIT	FOR ID.
Goodwin Exhibit 1, declaration	11
Goodwin Exhibit 2, document, campaign website printout titled "East Ramapo Coming Together"	46
Goodwin Exhibit 3, newspaper article from The Journal News	87
(EXHIBITS RETAINED BY REPORTER.)	